

Hearing Date: Oct. 23, 2019, 10:00 a.m. EST
Response Deadline: Oct. 16, 2019, 5p.m. EST

MAZURKRAEMER BUSINESS LAW
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re: : Bankruptcy No. 18-23538 (RDD)
SEARS HOLDING CORPORATION, :
et al. :
: Debtors. :
: :
: Related to: Docket No. 5242
: Chapter 11 (Jt. Admin.)
: Document No.
: :
:

**NOTICE OF HEARING ON JOINT MOTION (Docket No. #5242) OF VIR VENTURES,
INC. AND AMI VENTURES, INC. FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE CLAIMS
PURSUANT TO 11 U.S.C. §§503(a), 503(b)(1) & 507(a)**

PLEASE TAKE NOTICE on September 26, 2019, the **JOINT MOTION OF VIR
VENTURES, INC. AND AMI VENTURES, INC. FOR ALLOWANCE AND PAYMENT
OF ADMINISTRATIVE CLAIMS PURSUANT TO 11 U.S.C. §§503(a), 503(b)(1) & 507(a)**
filed by VIR Ventures, Inc. (“VIR”) and AMI Ventures, Inc. (“AMI”) (taken together,
“Claimants” or “Movants”) (CM/ECF #5242) for an Order (i) ”) (i) compelling the payment of
sums outstanding post-petition on those certain agreements by and between the Debtors and VIR

and AMI whenever this Court deems such payments shall be due and owing; (ii) granting an Allowed administrative claim for all such unpaid post-petition obligations under the Agreements arising post-petition through and including February 15, 2019 and affording them administrative priority in the amount of \$95,362.30, or (iii) granting such other relief as this Honorable Court deems just and proper.

PLEASE TAKE NOTICE that a hearing to consider the Motion will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, Courtroom 118, 300 Quarropas Street, White Plains, New York, 10601-4140 on **October 23, 2019, at 10:00 a.m. EST (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses or objections (“Objections”) to the Motion may be asserted in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest, on a CD-ROM, in text searchable portable document format (PDF) (with a hard copy delivered directly to Chambers) in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the Amended Order Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018, (DOCKET NO. 405), so as to be filed and received no later than **October 16, 2019 at 4:00 P.M. (EASTERN TIME)**, (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion. The Movants may, on or after the Objection Deadline, submit to the Bankruptcy Court a proposed order, which may be entered without further notice or opportunity to be heard.

Respectfully submitted,

MAZURKRAEMER BUSINESS LAW

By: /s/ Salene R.M. Kraemer

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Date: October 2, 2019